

PUBLIC INQUIRY INTO THE 2022 PUBLIC ORDER EMERGENCY

IN THE MATTER OF A PUBLIC INQUIRY

under the *Emergencies Act*, RSC 1985, c 22 (4th Supp), ss 63(1)
and the *Public Inquiries Act*, RSC 1985, c I-11, Part I

AFFIDAVIT OF TRUDY MOORE

Affirmed October 11, 2022

(Pursuant to Rule 49 of the Inquiry's Rules for Procedure and Practice)

I, TRUDY MOORE, of the City of Ottawa, in the Province of Ontario, AFFIRM:

1. I am a legal assistant at Champ & Associates, the law firm representing the Ottawa Coalition of Businesses and Residents (the "Ottawa Coalition") in the Public Inquiry into the 2022 Public Order Emergency. As such, I have personal knowledge of the matters to which I hereinafter depose except where I have stated my evidence to be on information and belief, in which case I have indicated the source of my information and my belief in the truth of the information.
2. I am advised by Champ & Associates lawyer Christine Johnson and do believe that, on October 6, 2022, she created the video compilation titled the "Ottawa Coalition Compilation Video" (uploaded and numbered COA00000135), which the Ottawa Coalition seeks to rely on at the Inquiry.
3. I am advised by Ms Johnson and do believe that, to compile the above-noted video, she reviewed and included certain video clips and photos posted to social media and contained within news articles between January 28, 2022 to

February 20, 2022, displaying events that occurred in Ottawa during the Freedom Convoy 2022.

4. I am advised by Ms Johnson and do believe that, to create the Ottawa Coalition Compilation Video, she also reviewed and included certain video clips and photos attached as Exhibits to the Affidavit of Sean Flynn, affirmed September 30, 2022 and the Affidavit of Kiavash Najafi, affirmed October 7, 2022.
5. I am advised by Champ & Associates counsel, Emilie Taman and do believe, that on October 5, 2022, Ottawa resident Sean Burgess sent her various photographs of a counter-protest at Billings Bridge that took place on February 13, 2022, via the social media application Facebook Messenger. I am advised by Ms Taman that on October 5, 2022 she spoke with Mr Burgess by telephone and that he confirmed he was the author of the photographs.
6. I am advised by Ms Johnson and do believe, that to create the Ottawa Coalition Compilation Video, she reviewed and included some of the photographs Ms Taman received from Mr Burgess on October 5, 2022.
7. Descriptions of the videos and photos included within the Ottawa Coalition Compilation Video and information about the source of these multimedia files are outlined below.

Videos and photos contained within Ottawa Coalition Compilation Video

8. The video clip commencing at 00:00 of the compilation video depicts Freedom Convoy trucks parked along the Queen Elizabeth Driveway. This video was

posted to Twitter by @_llebrun on January 29, 2022 at 4:16PM:

https://twitter.com/_llebrun/status/1487535048563863561.

9. The video clip commencing at approximately 00:22 of the compilation video depicts Freedom Convoy protesters honking their horns in downtown Ottawa. This video was posted to Twitter by @sfyro on January 30, 2022 at 8:50PM:
<https://twitter.com/sfyro/status/1487966419778215938>.
10. The photo at approximately 00:49 of the compilation video depicts the Terry Fox Monument holding an upside-down Canadian flag and wearing a sign that says "Mandate Freedom". This photo was posted to Twitter by @mackaytaggart on January 29, 2022 at 1:04PM:
<https://twitter.com/mackaytaggart/status/1487486909131677698>.
11. The video clip commencing at approximately 00:51 of the compilation video depicts a Freedom Convoy protester standing and dancing on the Tomb of the Unknown Solider. This video was posted to Twitter by @S_Thornton_332 on January 29, 2022 at 3:09PM:
https://twitter.com/S_Thornton_332/status/1487518296668721153.
12. The photo at approximately 01:03 of the compilation video depicts a Freedom Convoy truck adorned with a confederate flag. This video was posted to Twitter by @ArielTroster on January 28, 2022 at 10:13AM:
<https://twitter.com/ArielTroster/status/1487081459546529798>.

13. The photo at approximately 01:06 of the compilation video depicts Freedom Convoy protesters holding: (a) a flag with a swastika; (b) a Gadsden Flag; and (c) flags bearing the words “F*ck Trudeau”. This photo was posted to Twitter by @MarkGerretsen on January 29, 2022 at 3:05PM:
<https://twitter.com/MarkGerretsen/status/1487517212562927618>.
14. The video clip commencing at approximately 01:09 of the compilation video depicts an interaction between a Freedom Convoy protester and staff at a hotel in Ottawa. This video was posted to Twitter by @CharmainKB16 on January 28, 2022 at 6:41PM:
<https://twitter.com/CharmainKB16/status/1487209270227709952>.
15. The video clip commencing at approximately 01:52 of the compilation video depicts Freedom Convoy protesters dancing in the street and trucks honking. This video was posted to Twitter by @CarymaRules on January 31, 2022 at 9:15PM: <https://twitter.com/CarymaRules/status/1488335287390556164>.
16. The video clip commencing at approximately 02:20 of the compilation video depicts Freedom Convoy trucks blocking downtown streets and honking. This video was posted to Twitter by @KatherineDines on February 1, 2022 at 1:34PM: <https://twitter.com/KatherineDines/status/1488581639479382025>.
17. The video clip commencing at approximately 02:36 of the compilation video depicts Freedom Convoy trucks (including a vehicle that looks like a military tank) occupying downtown streets and honking. This video was recorded by

Kiavash Najafi on February 2, 2022 and is attached as Exhibit "A" to his Affidavit affirmed October 7, 2022.

18. The photo at approximately 02:45 of the compilation video depicts a truck parked in the middle of Cooper Street and three Centretown residents standing in the middle of the street giving the truck the "thumbs down" sign. This video was posted to Twitter by @KiavashNajafi on January 31, 2022 at 9:00PM:
<https://twitter.com/KiavashNajafi/status/1488331412575072257>.
19. The video clip commencing at approximately 02:48 of the compilation video depicts Freedom Convoy protesters and trucks honking horns, with a counter-protester standing in the middle of the street holding a sign that states "We will not be held hostage in our own city". This video was posted to Twitter by @CaryamRules on February 1, 2022 at 6:06PM:
<https://twitter.com/CarymaRules/status/1488650075769344000>.
20. The video clip commencing at approximately 03:09 of the compilation video depicts Freedom Convoy protesters occupying and partying in downtown streets, filmed from a balcony overlooking these activities. This video was posted to Twitter by @sasaozz on February 1, 2022 at 9:36PM:
<https://twitter.com/sasaozz/status/1488702952713900034>.
21. The video clip commencing at approximately 03:25 of the compilation video depicts Freedom Convoy protesters partying and setting off fireworks in close proximity to downtown buildings. This video was posted to Twitter by

@nikki_miumiu on February 5, 2022 at 11:01PM:

https://twitter.com/nikki_miumiu/status/1490173784900259840.

22. The video clip commencing at approximately 03:42 of the compilation video depicts Freedom Convoy protesters setting off fireworks in close proximity to apartments, condos, and office space downtown. This video was posted to Twitter by @cattunneycbc on February 5, 2022 at 8:00PM:
<https://twitter.com/cattunneycbc/status/1490128195747729411>.
23. The video clip commencing at approximately 03:59 of the compilation video depicts a Tiktok video made by a Freedom Convoy protester named David Alderton, wherein he tells protesters to give the residents of the City of Ottawa a “wake up call” by honking their horns. This video was posted to Tiktok by @davidalderton1980 on February 5, 2022 at approximately 8AM:
https://www.tiktok.com/@davidalderton1980/video/7061211507656264966?is_copy_url=1&is_from_webapp=v1, which is no longer active.
24. The video clip commencing at approximately 04:34 of the compilation video depicts Freedom Convoy protester vehicles blocking Centretown streets and honking. This video was recorded by Kiavash Najafi on February 5, 2022 and is attached as Exhibit “C” to his Affidavit affirmed October 7, 2022.
25. The video clip commencing at approximately 05:07 of the compilation video depicts Freedom Convoy protester vehicles blocking Centretown streets and

honking. This video was recorded by Kiavash Najafi on February 5, 2022 and is attached as Exhibit “B” to his Affidavit affirmed October 7, 2022.

26. The video clip commencing at 05:19 of the compilation video depicts Freedom Convoy protester vehicles driving down Centretown streets, honking, and blowing air horns. This video was recorded by Kiavash Najafi on February 6, 2022 and is attached as Exhibit “D” to his Affidavit affirmed October 7, 2022.
27. The video clip commencing at approximately 05:34 of the compilation video depicts Freedom Convoy vehicles idling outside of residential buildings in Centretown. This video was posted to Twitter by @KiavashNajafi on February 5, 2022 at 8:33AM:
<https://twitter.com/KiavashNajafi/status/1489955286995677186>.
28. The photo at approximately 05:41 of the compilation video depicts Freedom Convoy protesters erecting a wooden structure near the Rideau Canal. The photo at approximately 05:44 of the compilation video depicts propane tanks and gas cannisters piled inside a fenced area. These photos was posted to Twitter by @AnnieClaireBO on February 3, 2022 at 3:27PM:
<https://twitter.com/AnnieClaireBO/status/1489334870753042432>.
29. The photo at approximately 05:47 of the compilation video depicts an overheard drone shot of Freedom Convoy vehicles parked on Coventry Road. This photo was published in a CBC article, “How organizers with police and military expertise may be helping Ottawa convoy protest dig in” on February 9,

2022: <https://www.cbc.ca/news/canada/convoy-protesters-police-tactical-knowledge-1.6345854>.

30. The video clip commencing at approximately 05:50 of the compilation video depicts an interaction between Freedom Convoy protesters riding in a truck and a pedestrian. During this interaction, one of the truck passengers can be heard saying “You’re gonna fucking die you little bitch”. This video was posted to Twitter by @LittleMxSurly on February 5, 2022 at 9:02PM:
<https://twitter.com/LittleMxSurly/status/1490143736852066304>.
31. The video clip commencing at approximately 06:11 of the compilation video depicts Freedom Convoy vehicles occupying a downtown street and honking loudly. This video, recorded by Ottawa resident Sean Flynn, also shows the high decibel levels recorded by Mr. Flynn’s Smart Watch. This video was posted to Twitter by @sfyro on February 5, 2022 at 8:20PM:
<https://twitter.com/sfyro/status/1490133171106631680>.
32. The video clip commencing at approximately 6:30:83 of the video compilation depicts an interaction between an Ottawa resident in a blue jacket and Freedom Convoy protesters. This video was posted widely on social media and also online at: https://convoyarchive.org/wiki/Blue_Jacket_Guy.
33. The video clip commencing at approximately 07:13 of the compilation video depicts Facebook Live broadcast on February 7, 2022 by one of the Freedom Convoy organizers, Patrick King. This video was initially broadcast on Mr. King’s

Facebook Live channel starting at 3:03PM on February 7, 2022:

<https://fb.watch/b1dCQTIMAL>, which is no longer active.

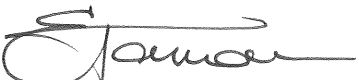
34. The video clip commencing at approximately 07:26 of the compilation video depicts Freedom Convoy protesters lining up jerry cans of gas in front of trucks. This video was posted to Twitter by @sfyro on February 8, 2022 at 8:56PM:
<https://twitter.com/sfyro/status/1491229389123911680>.
35. The photo at approximately 07:41 of the compilation video depicts Freedom Convoy protesters sitting in an inflatable hot tub erected in the middle of a downtown street. This photo was published in a CBC article, "Ottawa police launch command centre with OPP, RCMP amid 'overwhelming' protests" on February 12, 2022: <https://www.cbc.ca/news/canada/ottawa/ottawa-protest-third-weekend-1.6348554>.
36. The photo at approximately 07:44 of the compilation video also depicts Freedom Convoy protesters sitting in an inflatable hot tub erected in the middle of a downtown street. This photo was posted to Twitter by @davidpugliese on February 12, 2022 at 9:13PM:
<https://twitter.com/davidpugliese/status/1492683280071544832>.
37. The photos commencing at approximately 07:46 of the compilation video depict staff at the Farm Boy grocery store on Metcalfe Street closing early on February 12, 2022 due to the protests. These photos were posted to Twitter by @CreesonCTV at 5:05PM:
<https://twitter.com/CreesonCTV/status/1492620852764020743>.

38. The photo at approximately 07:56 of the compilation video depicts a counter-protest by Ottawa residents and features a counter-protester holding a sign that says "Harassment is not peaceful". This photo was published in a CBC article, "Ottawa police launch command centre with OPP, RCMP amid 'overwhelming' protests" on February 12, 2022:
<https://www.cbc.ca/news/canada/ottawa/ottawa-protest-third-weekend-1.6348554>.
39. The video clip commencing at approximately 07:59 of the compilation video depicts Ottawa residents attending a counter-protest at Billings Bridge on February 13, 2022. This video was posted to Twitter by @AlexiaNaidoo on February 13, 2022 at 11:19AM:
<https://twitter.com/AlexiaNaidoo/status/1492896158590676995>.
40. The photos commencing at approximately 08:22 of the compilation video depict Ottawa residents attending a counter-protest at Billings Bridge on February 13, 2022. I am advised by Ms Taman and do believe that these are the photos which were taken by Ottawa resident Sean Burgess and sent to her via Facebook Messenger on October 5, 2022.
41. The photos commencing at approximately 08:37 of the compilation video depict Freedom Convoy vehicles parked along Kent Street for 11 blocks. These photos were posted to Twitter by @KiavashNajafi on February 15, 2022 at 7:30PM: <https://twitter.com/KiavashNajafi/status/1493744617203896326>.

42. The video clip commencing at approximately 08:43 of the compilation video depicts Freedom Convoy vehicles honking loudly. This video, recorded by Ottawa resident Sean Flynn, also shows the high decibel levels recorded by Mr. Flynn's Smart Watch. This video was posted to Twitter by @sfyro on February 16, 2022 at 7:10PM: <https://twitter.com/sfyro/status/1494101847673643011>.
43. The video clip commencing at approximately 09:01 of the compilation video depicts a Freedom Convoy protester carrying a wagon of jerry cans in downtown Ottawa and an OPP vehicle parked within view. I am advised by Ms Taman and do believe that this video was recorded by Kiavash Najafi on February 16, 2022 and that Mr Najafi sent it to her by email on September 16, 2022.
44. The video clip commencing at approximately 09:20 of the compilation video depicts City Councillor Catherine McKenney walking downtown during the Freedom Convoy protest. It features a sign on a door that says "Trying to live here". This video was recorded by Kiavash Najafi on February 16, 2022 and is attached as Exhibit "G" to his Affidavit affirmed October 7, 2022.
45. The video clip commencing at approximately 09:36 of the compilation video depicts City Councillor Catherine McKenney walking downtown during the Freedom Convoy protest. It features an outhouse erected on a truck flatbed. This video was recorded by Kiavash Najafi on February 16, 2022 and is attached as Exhibit "H" to his Affidavit affirmed October 7, 2022.

46. The photo at approximately 09:36 of the compilation video depicts a Freedom Convoy protester carrying a wagon filled with jerry cans. This photo was taken by Kiavash Najafi on February 17, 2022 and is attached as Exhibit "I" to his Affidavit affirmed October 7, 2022.
47. The video commencing at approximately 09:48 of the compilation video depicts Councillor Catherine McKenney walking downtown during the Freedom Convoy protest, while participating in a video call with the Ottawa Police Service. I am advised by Ms Taman and do believe that this video was recorded by Kiavash Najafi on February 16, 2022 and that Mr Najafi sent it to her by email on September 16, 2022.
48. I make this affidavit in good faith and for no improper purpose.

AFFIRMED before me in the City of)
Ottawa, in the Province of Ontario,)
this __11th__ day of October, 2022.)


A commissioner for taking affidavits)


Trudy Moore)